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November 19, 2002

EX PARTE

*Via Electronic Filing*  
Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12 Street, S.W., TW-A325  
Washington, DC 20554

Re:  
In the Matter of Review of Section 251 Unbundling Obligations of Incumbent  
Local Exchange Carriers and Implementation of the Local Competition  
Provisions in the Local Telecommunications Act of 1996, CC Docket Nos. 01-  
338; 96-98; 98-147

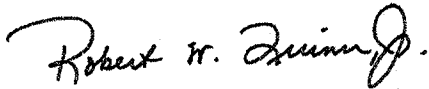
Dear Ms. Dortch:

Yesterday, David Dorman, Chairman and CEO of AT&T, Len Cali, Vice President-Law & Director Federal Government Affairs, and I met with Commissioner Kathleen Q. Abernathy and Matthew Brill, Commissioner Abernathy's Legal Adviser, to discuss issues related to the aforementioned proceedings. During the course of that discussion, Mr. Dorman emphasized that AT&T remains committed to providing competitive telecommunications services to residential and business customers in local markets, that it prefers to do so with its own facilities, but must lease access incumbent network elements to do so at this time. In particular, Mr. Dorman emphasized that the manual hot processes utilized by the ILECs will not permit AT&T to serve the residence and small/medium sized business markets that are currently being served with UNE-P in any other way, and he underscored the importance of electronic provisioning of loops as an essential precondition to the de-listing of switching. In short, Mr. Dorman explained the impairments AT&T faces in serving these customers (as diagrammed on the attached charts) and explained that it would be impossible to serve these markets effectively without access to the unbundled local switching network element. He also

stated that AT&T remains committed to working with the Commission to establish a framework that will allow competition in those customer markets to flourish.

The positions expressed by AT&T were consistent with those contained in the Comments and ex parte filings previously made in the aforementioned dockets. One electronic copy of this Notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Sincerely,

A handwritten signature in cursive script, reading "Robert W. Quinn, Jr.".

Robert W. Quinn, Jr.

cc: Commissioner Abernathy  
Matthew Brill

# UNE Loops Cannot Support Meaningful Competitive Entry

## UNE-L Provisioning v. LD PIC Process

	UNE-L	LD PIC Process
Service Interval (POS to Dial Tone):	45 days	1 to 3 days
Customer Cancellations Prior to Cut-Over:	54%	de minimis
Rate of Service Interruption:	6-9%	de minimis
Mean Time to Repair Service Interruption:	15 to 35 hours	
Trouble Tickets per order:	5-9%	de minimis
Volumes:	Constrained	Effectively Unconstrained